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**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

MEGAN SCHMITT, DEANA
REILLY, CAROL ORLOWSKY, and
STEPHANIE MILLER BRUN,
individually and on behalf of
themselves and all others similarly
situated,

Plaintiffs,

v.

YOUNIQUE, LLC,

Defendant.

Case No. 8:17-cv-01397-JVS-JDE

**PLAINTIFF'S UNOPPOSED
MOTION FOR PRELIMINARY
APPROVAL OF CLASS ACTION
SETTLEMENT, PRELIMINARY
CERTIFICATION OF
SETTLEMENT CLASS, AND
APPROVAL OF NOTICE PLAN**

Complaint Filed: 8/17/17

Plaintiffs MEGAN SCHMITT, DEANA REILLY, and STEPHANIE MILLER BRUN, (“Plaintiffs”) respectfully move this Court for an Order preliminarily approving the proposed class action settlement (“Settlement”), approving the form of notice, and scheduling the final approval hearing as set forth in the Settlement Agreement attached as Exhibit 1 to the Declaration of Adam Gonnelli (“Gonnelli Declaration”). Specifically, the Parties ask that the Court enter the proposed Order, thereby

1. granting Preliminary Approval of the Settlement;
2. approving the proposed Notice Program;
3. appointing the Heffler Claims Group as Settlement Administrator and directing it to commence the Notice Program;
4. conditionally certifying the proposed Class for the purposes of Settlement;
5. appointing Plaintiffs and certain other class members as Class Representatives for the Settlement Class and their counsel as Class Counsel for the Settlement Class; and
6. setting a schedule for settlement procedures filings and scheduling a Final Approval Hearing.

In support of this Unopposed Motion, Plaintiffs rely on the attached Memorandum of Law, the Declarations of Adam Gonnelli and Scott Fenwick and their supporting exhibits, all documents filed therewith, and the arguments of counsel.

Respectfully submitted on this 12th day of August, 2019.

Signatures of counsel on following page.

Dated: August 12, 2019

NYE, STIRLING, HALE & MILLER, LLP

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